

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW ROGERS,)	
)	Case No. 1:16-cv-02104
Plaintiff,)	
)	Judge Jorge L. Alonso
v.)	
)	Magistrate Judge Mary M. Rowland
GET GREEN RECYCLING, LLC)	
and DANIEL MEYERS,)	
)	
Defendants.)	

**JOINT MOTION FOR APPROVAL OF FAIR LABOR STANDARDS ACT
SETTLEMENT AGREEMENT AND JOINT STIPULATION TO DISMISS**

The Parties, by their respective counsel, jointly move this Court for Approval of their Fair Labor Standards Act, 29 U.S.C. §§201 *et. seq.* Settlement Agreement and for entry of a dismissal order as follows:

1. After a settlement conference with the Court, the parties reached an agreement as to all of the Plaintiff's claims in the above captioned action.
2. The material terms of the Settlement Agreement were thereafter recited on the record.
3. Both parties have been represented by counsel in the litigation and in connection with all settlement negotiations.
4. Plaintiff's counsel has approved the terms of the parties' written Settlement Agreement.
5. A copy of the confidential Settlement Agreement will be delivered to the Court for review on March 1, 2017.
6. Upon approval by the Court that the terms of the Settlement Agreement are fair and reasonable, the Parties request that this Court enter an Order dismissing the case without prejudice, and, that the Order convert to with prejudice after the completion of all settlement

payments on October 15, 2018, unless Plaintiff has moved to reinstate this case prior thereto for nonpayment under the Settlement Agreement.

Dated: February 28, 2017

Respectfully Submitted,

/s/ David J. Fish

Attorney for Plaintiffs
The Fish Law Firm, P.C.
200 E. 5th Avenue, Suite 123
Naperville, IL 60563
dfish@fishlawfirm.com

/s/Jennifer Adams Murphy

Attorney for Defendants
Wessels Sherman
2035 Foxfield Road
St. Charles, Illinois 60174
jemurphy@wesselssherman.com